

**DECLARATION OF ALEC CHAMBERS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY  
INJUNCTION**

4833-6921-3643v.1 0113766-000006

I, Alec Chambers, declare:

1. I am a plaintiff in this case. I have personal knowledge of and am competent to testify to the facts in this declaration.

2. I grew up surrounded by music and wanting to pursue a career in music. I taught myself how to sing and play the piano, and my father, a musician, taught me how to play the guitar. Breaking into the industry, however, has been really hard. Before I joined TikTok, I posted videos on YouTube, but I was not reaching a wide audience, and I was not earning much money. To make a living, I drove passengers for the ride-sharing service Uber.

3. At the end of 2018, I began to post videos on TikTok. I did a cover of the song "Without Me" by the singer Halsey. The video had 23 million views and three million likes. Overnight, my music career was launched, and TikTok had changed my life and given me the financial freedom to pursue music. Although I had posted the same video on YouTube, it was only after I posted on TikTok that I saw a major increase in streaming on the music streaming platform Spotify. I earn about \$4,500 each month from streaming "Without Me" on Spotify, and I have about 1.8 million followers.


4. TikTok has also provided me opportunities to earn money through promotional videos for brands. For example, I earned \$12,000 for promoting the Extra gum brand in a video in which I sang and played the piano. I have also done work for the Hyundai automaker and Cinnamon Toast Crunch cereal.

5. I also look at videos in TikTok for personal purposes. For example, I watch self-help videos and comedies.

6. If I didn't have TikTok, I would be in a totally different place. I owe my fan base to TikTok's ability to reach an audience, and I hope to use the fan base I have gained through TikTok to grow my music career.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Shelton, Connecticut, this 17 day of September, 2020.

  
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Alec Chambers